

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION - DETROIT**

**IN THE MATTER OF:
BRETT AUSTIN WAGNER,**

**CASE NO: 19-43553
CHAPTER: 13
JUDGE: RANDON**

Debtor.

_____ /

**RESPONSE TO SANTANDER CONSUMER USA, INC'S MOTION FOR RELIEF
FROM THE AUTOMATIC STAY**

Now Comes Debtor, **BRETT AUSTIN WAGNER**, by and through Debtor's Attorneys, Frego & Associates – The Bankruptcy Law Office, PLC, and for Debtor's response to MOTION FOR RELIEF FROM THE AUTOMATIC STAY states as follows:

1. Debtor admits.
2. Debtor admits.
3. Debtor admits.
4. Debtor admits.
5. Debtor neither admits nor denies and leaves movant to its proofs.
6. Debtor admits.
7. Debtor neither admits nor denies and leaves movant to its proofs.
8. Debtor admits.
9. Debtor neither admits nor denies and leaves movant to its proofs.
10. Debtor neither admits nor denies and leaves movant to its proofs.
11. Debtor neither admits nor denies and leaves movant to its proofs.
12. Debtor neither admits nor denies and leaves movant to its proofs.
13. Debtor admits.
14. Debtor denies and further states that he plans on curing any arrears.
15. Debtor admits.

WHEREFORE Debtor requests that this Honorable Court set this matter for hearing.

Respectfully submitted,

/s/ Toni Valchanov _____
Frego & Associates – The Bankruptcy
Law Office, PLC
Attorneys for Debtors
23843 Joy Rd.
Dearborn Heights, MI 48127
313-724-5088
fregolaw@aol.com
Toni Valchanov P75398

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CERTIFICATE OF SERVICE

I, Toni Valchanov, hereby state that on 5/5/2021, I electronically filed RESPONSE TO SANTANDER CONSUMER USA'S MOTION FOR RELIEF FROM THE AUTOMATIC STAY and this CERTIFICATE OF SERVICE, in said case with the Clerk of the Court using the ECF system which will send notification of such filing to the following parties:

TRUSTEE: Krispen S. Carroll: notice@det13ksc.com

CREDITOR: CRAIG S. SCHOENHERR, SR., Attorney for Creditor Santander Consumer USA, Inc.,
ecf@orlaw.com

/s/ Toni Valchanov
Frego & Associates – The Bankruptcy
Law Office, PLC
Attorneys for Debtors
23843 Joy Rd.
Dearborn Heights, MI 48127
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fregolaw@aol.com
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